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Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Thomas R. Spencer 999 Ponce de Leon Blvd. Suite 510 Coral Gables, Florida 33134	2. Registration No. 5924
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3. Name of foreign principal NCB Finetech Project	4. Principal address of foreign principal 42 Mosfilmovskaya Str., Moscow, 119285, Russia
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5. Indicate whether your foreign principal is one of the following:

☐ Foreign government

☐ Foreign political party

☒ Foreign or domestic organization: If either, check one of the following:

<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee
<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group
<input type="checkbox"/> Association	<input type="checkbox"/> Other (specify): _____

☐ Individual-State nationality _____

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant _____

b) Name and title of official with whom registrant deals _____

7. If the foreign principal is a foreign political party, state:

a) Principal address _____

b) Name and title of official with whom registrant deals _____

c) Principal aim _____

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal.

To the best of my knowledge, belief and observation, the foreign Principal is a private Russian business which represents foreign businesses seeking to do business in Russia, including businesses which seek to do business with departments of the Russian Government. The Principal coordinates these activities. Moreover, it is my belief that the Principal from time to time attempts to facilitate or represent the interests of persons connected to or providing consultation to departments of the Russian Government to further the international or foreign policy interests of the Russian Government and the general interests of the Russian people.

The answers to b) below are based on my belief and observation, but not based on direct personal knowledge.

b) Is this foreign principal

Supervised by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Owned by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Directed by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Controlled by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Financed by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

Subsidized in part by a foreign government, foreign political party, or other foreign principal

Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must be used.)*

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

It is my belief that the Principal is solely owned and controlled by its Director General, Mr. Rustam Churyakov.

Date of Exhibit A
March 26, 2009

Name and Title
Thomas R. Spencer

Signature



Exhibit B
To Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. One original and two legible photocopies of this form shall be filed for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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1. Name of Registrant
Thomas R. Spencer

2. Registration No.

3. Name of Foreign Principal
NCB Finetechproject

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REGISTRATION UNIT

Check Appropriate Boxes:

4. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.

5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.

6. ☒ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.

The Principal has requested my assistance (without fee or compensation) to propose ideas and concepts in order to forge better relations between the Russian government and the United States Government, especially in the area of security, anti-terrorism and anti-corruption. Further, Principal has requested that I communicate these ideas to the United States Government and propose better informal channels of communication and discussion between the Russian Government and the United States Government.

7. Describe fully the nature and method of performance of the above indicated agreement or understanding.
I have proposed to conduct research and prepare short papers with new ideas and new concepts to combat terrorism and corruption and to improve lines of communication by and between the Russian Government and the United States Government. I have proposed to seek acceptance of these ideas and propose new channels of communication and discussion between the governments of the United States and of Russia. I have proposed to submit to the Principal and to the United States Government ideas to improve the image and relations between the two countries and their officials. My sole interest is to improve and secure the national security of the United States. For this reason, I have agreed to do this without compensation, but also to improve my business and professional contacts in Russia and elsewhere.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

1. Research and prepare papers on new ways, means and methods to combat terrorism, international crime and public corruption and money-laundering with the focus on possible joint initiatives of Russia and the United States. I will propose these ideas to both governments and distribute these papers to representatives of both governments.
2. Attempt to meet with representatives of or consultants to the government of Russia to gain acceptance for these ideas and joint initiatives.
3. Attempt to meet with representatives of or consultants to the government of the United States to gain acceptance for these ideas and initiatives.
4. If appropriate, write to politicians and public officials of the United States to gain acceptance for the initiatives generally deemed acceptable to officials of or consultants to the government of Russia.
5. If appropriate, write Editorials or seek Press coverage for these proposed new initiatives, when conceived and vetted.
6. Attempt to encourage joint study groups in and of both Russia and the United States to explore new joint programs to bolster national security, combat terrorism and corruption.
7. Convey to the United States Government suggestions forwarded to me by the Principal.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant has yet to discuss specific activities with the Principal. However, it is probable that Registrant will contact public officials of both Russia and the United States to gain acceptance of the proposals. No political activities have yet been planned.

Date of Exhibit B
March 26, 2009

Name and Title
Thomas R. Spencer

Signature

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.